

REMARKS

Reconsideration of this application is respectfully requested.

Claims 1-18 are currently pending in the application. In the Office Action, the Examiner has rejected Claims 1-18 under 35 U.S.C. § 102(e), as being anticipated by *Boag et al.* (U.S. 6,589,291 B1).

Independent Claims 1, 17, and 18 of the present application are directed to conditioning content for presentation at a processing device. More specifically, the content is to be presented according to a content profile and a style sheet associated with the processing device.

The title of *Boag*, i.e., "Dynamically Determining the Most Appropriate Location for Style Sheet Application", clearly leads one to understand that that invention is directed to the **application of style on some specific device (location)**. More specifically, *Boag* is directed to dynamically determining the most appropriate **device (location) for performing the application of style sheets**. The style sheets may be applied on devices such as a server (and/or Web proxy), or on a client, or when multiple style sheets are to be applied, some may be applied at the server while others are applied at the client.

However, unlike *Boag*, the present invention, as recited in Claims 1, 17, and 18, is not directed to **where the application of style** takes place. Contrary, the present invention is directed to formatting documents **for display on devices** having different capabilities. For example, television, computer, cell phone, personal digital assistant (PDA), and etc. screens have different capabilities, and therefore the same document must be stylized differently for display on different device.

In a further distinction, the present invention claims a two-step process, it determines the content profile and conditions the document in accordance with that content, i.e., if a television is the device, more intense graphics will be displayed as opposed to when a PDA is the destination.

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A content profile may suggest that the target device only supports audio, and the document will be conditioned accordingly to only display audio. Examples of content profiles are presented in FIGs. 4A, 4B, and 4C. No mention of **content profiles** or their equivalents is made in *Boag*. In a second step, the style will be applied to the document that was conditioned in the first step. The style being appropriate to the target device.

The Examiner again cites column 3, lines 14-19, teaching "dynamically **determining one or more transformations** that may be used to transform an input document in a first notation into a document in a different notation, where the output notation is tailored to (among other things) the target environment where the document will be rendered for presentation" (emphasis added), and column 4, lines 40-60 of *Boag*, which is presented below:

In one aspect, when the determining has a positive result, the technique may further comprise: caching the selected style sheets at the server; modifying the input document to refer to the cached style sheets; and sending the modified input document to the client. When the determining has a negative result, the technique may further comprise: sending the input document to the client following completion of the applying at the server. In another aspect, when the determining step has a positive result, the technique further comprises: caching the selected style sheets at the server; modifying the input document to refer to the cached style sheets; trimming the modified input document using a style sheet preprocessor; and sending the trimmed input document to the client. In this aspect, when the determining has a negative result, the technique further comprises sending the input document to the client following completion of the applying at the server.

It is respectfully submitted that this selection does not describe any **content profile** or a target device style determination and, as was previously pointed out by the Applicants, does not describe how that which is stated is achieved. In response to Applicants' arguments, the Examiner now cites column 4, lines 30-33, which reads "selecting one or more style sheets to transform a particular input document; determining whether a **client device is capable of applying** the selected style sheets" (emphasis added).

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This statement, however, as was set forth above, teaches away from the invention, because the object and the teaching of the present invention is **finding the proper formatting** for a file to be displayed on a particular target device, **not finding a proper target device** on which to apply the particular formatting, which is taught by the above citation.

None of the selections offered by the Examiner, or any other section of *Boag* teach or describe determining a **content profile** associated with the device and generating a conditioned document by applying the **content profile** to a requested document containing content for presentation at the device, as recited in Claims 1 and 18 of the present invention. Furthermore, *Boag* does not teach or describe a further processing of the same file, specifically determining a stylesheet associated with the device and **applying the stylesheet to the conditioned document** to generate an output suitable for presentation at the device, as recited in Claims 1 and 18 of the present invention.

Therefore, it is respectfully submitted that the Examiner is incorrect in rejecting Claims 1, and 18, as being anticipated by *Boag*, as *Boag* does not disclose every recitation of the rejected claims. Accordingly, it is respectfully requested that the rejection of Claims 1 and 18 be withdrawn.

Without conceding the patentability per se of dependent Claims 2-16, they are likewise believed to be allowable by virtue of their dependence on Claim 1. Independent Claim 17 is an apparatus claim including limitations of the method Claim 1. Accordingly, reconsideration and withdrawal of the rejections of Claim 17 and dependent Claims 2-16 are respectfully requested.

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In view of the preceding remarks, it is respectfully submitted that all pending claims, namely Claims 1-18 are in condition for allowance. Should the Examiner believe that a telephone conference or personal interview would facilitate resolution of any remaining matters, the Examiner may contact Applicants' attorney at the number given below.

Respectfully submitted,



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